

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

John Doe,) Civil Action No. 3:21-cv-02748-MGL

Plaintiff,)

vs.)

Childs Cantey Thrasher, Donald Gist,)
Brian M. Barnwell, Scott E. Frick, AJ)
Holloway, Don Jackson, and Brandolyn)
Thomas Pinkston, in their official)
capacities as members of the South)
Carolina Ethics Commission; Alan Wilson,)
in his official capacity as Attorney)
General; and Byron Gipson, in his official)
capacity as Fifth Circuit Solicitor,)

Defendants.)

STATE ETHICS COMMISSION
DEFENDANTS' RESPONSES TO
LOCAL CIVIL RULE 26.01
INTERROGATORIES

Defendants Childs Cantey Thrasher, Donald Gist, Brian M. Barnwell, Scott E. Frick, AJ Holloway, Don Jackson, and Brandolyn Thomas Pinkston, in their official capacities as members of the South Carolina Ethics Commission (collectively, the State Ethics Commission), by and through the undersigned attorneys, respond to the Local Rule 26.01 Interrogatories as follows:

1. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: The State Ethics Commission is unaware of any such persons or entities.

2. As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE: This case should be tried nonjury given that Plaintiff is seeking a declaratory judgment and injunctive relief.

3. State whether the party submitting these responses is a publicly owned company and separately identify: (a) each publicly owned company of which it is a parent, subsidiary,

partner, or affiliate; (b) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (c) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: Not applicable.

4. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: The State Ethics Commission, which is located in Columbia, South Carolina, agrees the Columbia Division of the District of South Carolina is appropriate for the trial of this matter.

5. Is this action related in whole or in part to any other matter filed with this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges?

RESPONSE: The State Ethics Commission is not aware of any other related matter.

6. If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Not applicable.

7. If you contend that some other person or legal entity is, in whole or in part,

liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: Not applicable.

Respectfully submitted,

/s/Vordman Carlisle Traywick, III
Rebecca Laffitte (Fed. ID 1036)
Robert E. Tyson, Jr. (Fed. ID 7815)
Vordman Carlisle Traywick, III (Fed. ID 12483)
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Counsel for State Ethics Commission Defendants

Columbia, South Carolina
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